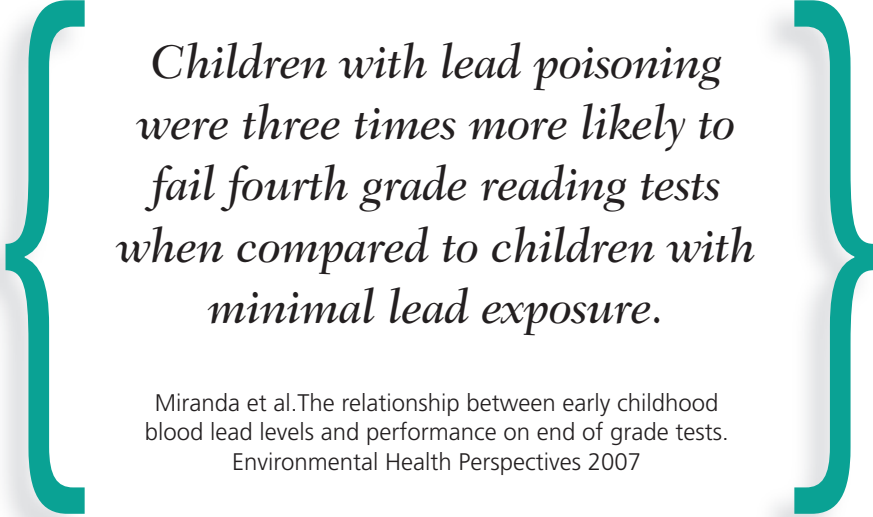




RESPONSE TO 2009 SENATE JOINT RESOLUTION 65

Prepared by the Childhood Lead
Poisoning Elimination Implementation
and Oversight Committee

December 29, 2010

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*Children with lead poisoning
were three times more likely to
fail fourth grade reading tests
when compared to children with
minimal lead exposure.*

Miranda et al. The relationship between early childhood
blood lead levels and performance on end of grade tests.
Environmental Health Perspectives 2007

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REPORT HIGHLIGHTS

Childhood lead poisoning is a costly problem for Wisconsin. However, this problem has a readily identifiable solution: remove or fix lead paint hazards in older homes.

Where children get lead poisoned

- Most children are lead poisoned in their homes due to lead-contaminated dust from deteriorating paint.
- Approximately 90 percent of lead poisoned children in Wisconsin reside in dwellings built before 1950. Dwellings built before 1950 are the highest risk for lead paint hazards because lead-free latex paints were not yet available.
- There are more than 400,000 existing dwellings built before 1950 that have lead paint hazards across all 72 counties in Wisconsin.

One solution to stop lead poisoning is to establish a sustainable funding source to control lead paint hazards and create lead-safe housing. The Childhood Lead Poisoning Elimination Implementation and Oversight Committee (IOC) recommends that Wisconsin create a statewide revolving loan program to assist property owners by offering them no- or low-interest loans to fix lead paint hazards in older homes. Wisconsin should couple the fund with a widespread community awareness campaign to promote the loan program and increase public awareness of the risks of lead poisoning and ways to reduce these risks.

Lead poisoning is a concern to our society and Wisconsin taxpayers

Wisconsin children have among the highest lead poisoning rates in the nation. More than 46,000 children under age 6, enough to fill Miller Park, were reported lead-poisoned since 1996; more than 1,500 children in 2009 alone. Every county in the state is affected. There is no safe level of lead in the human body. Lead exposure decreases the life-long potential of affected children by damaging the human brain — reducing a child's ability to learn and causing behavioral problems and life-long health problems.

- A linkage has been firmly established between lead-poisoned children and failure in school as well as later criminal and violent behavior. Children who were lead-poisoned score lower on standardized tests and are more likely to be arrested for a violent crime as a young adult.

- Lead poisoning costs a fortune. Each year Wisconsin spends over \$5 billion on school aids including \$375 million for special education and \$1 billion for corrections. Some percentage of these costs is attributable to lead poisoning.
- If each Wisconsin child age 0-6 today were protected from all lead exposure, the resultant improvements in the high school graduation rate and state reduction in crime would save Wisconsin **\$28 billion**, according to a cost benefit model developed in a New Jersey study. These savings would multiply each year as new children are born in Wisconsin.

Report recommendations

- Create a sustainable statewide revolving loan fund accessible to property owners at all income levels and with a dedicated source of funding to fix lead paint hazards and thus create lead-safe housing for children. An annual investment of at least \$20 million a year would allow for lead paint hazards to be addressed in at least 2,000 additional homes each year.

In concert with establishing a loan fund, include:

- Dedicated resource capacity for ongoing evaluation of lead poisoning elimination efforts.
- A strategic community awareness campaign for lead-safe housing. Funding recommendations include:
 1. Authorize a paint surcharge.
 2. Establish bonding authority.
 3. Create a voluntary contribution on the Wisconsin income tax forms and match it with general program revenues.

*Nearly one of every
20 children entering the
Wisconsin school system in the
fall of 2006 was known to
have been lead poisoned.*

Legacy of Lead: Report on Childhood Lead Poisoning in
Wisconsin 2008 WI Department of Health Services

BACKGROUND

Lead poisoning is particularly tragic because, as a housing-based disease, it is **completely preventable**. Lead-based paint is the primary source of lead in children's environments. Although lead was banned from household paint in the United States in 1978, old lead paint and varnish (hereafter referred to as "paint") still coat the walls, windows, doors, floors, ceilings, porches, and stairs of many older homes. Old paint deteriorates over time due to friction, impact, moisture, and temperature fluctuations. Chipping and peeling lead coatings create dust on windows, floors, stairs, and porches where young children crawl and play. The lead dust gets on children's hands and into their mouths.

Homes built prior to 1950, before the widespread use of lead-free latex paint, contain the greatest lead paint hazards. Ninety percent of lead poisoned children in Wisconsin live in homes built prior to 1950. In Wisconsin, more than 400,000 homes built before 1950 have hazardous single-pane, lead-painted windows. Because weather and friction cause coatings on windows to deteriorate faster than other painted surfaces, window replacement is well documented as an effective housing strategy to help prevent lead poisoning¹. A simple solution to dramatically lower blood lead levels in Wisconsin children is to replace deteriorating windows, plus lead-painted siding, porches, doors and trim that pose a hazard.

Wisconsin consistently ranks among the top ten states for the number of children found to be lead poisoned. More than 46,000 children under age 6, enough to fill Miller Park, were reported lead-poisoned since 1996 — more than 1,500 children in 2009 alone. Every county in the state is affected. The actual numbers are likely higher since fewer than half of the high risk children received the recommended pediatric blood lead tests.

While over 100 years of rigorous research and studies have documented the detrimental effects of lead exposure in children, more recent advances in technology make it clear that low levels of lead, once thought to be safe, actually cause considerable damage to childhood developmental processes which have both immediate and lasting effects throughout a child's life and on subsequent generations.

Some effects of childhood lead poisoning include:

As children:

- Neurological disruptions², resulting in lowered IQ³, learning disabilities⁴, hearing loss and developmental delays such as speech and language abnormalities⁵.
- Greater likelihood of behavioral problems like aggression and other antisocial behavior⁴ and attention disorders such as hyperactivity and distractibility as in Attention Deficit Hyperactivity Disorder⁶.
- Poor school performance as children who were lead poisoned are three times more likely to fail fourth grade reading tests⁷. Exposure to lead is a more powerful predictor of poor school performance than either poverty or class size⁸.

As teens:

- School disciplinary problems⁹; lead poisoning also is linked with higher rates of high school dropout, teen pregnancy and juvenile delinquency^{10, 11}.
- A greater likelihood of poor upright balance, coordination and other motor skills therefore increasing long-term injury risk¹².
- Depression, panic attacks¹³ and kidney disease¹⁴ in adolescence.

As adults:

- A person who was lead-poisoned as a child is 50 percent more likely to be arrested for a violent crime as a young adult¹⁵.
- Lead can cause problems with reproductive functions in both men and women who were lead poisoned as children. Men can suffer from reduced libido and testicular dysfunction¹⁶ and women can develop hypertension when pregnant¹⁷.
- Women who were lead poisoned as children are at greater risk for adverse birth outcomes such as increased risk of spontaneous abortion and preterm delivery^{18, 19} and their infants can suffer from low birth weight²⁰ and can be lead-poisoned in the womb^{21, 22}.
- Childhood lead exposure is linked to adult kidney disease²³, diabetes²⁴, depression and panic attacks¹³, cognitive deficits such as memory loss and Alzheimer's disease²⁵, and increased adult risk of death from stroke²⁶ and heart attack²⁴.

These impacts come at a great cost, both economic and social, to the individuals and families affected by lead poisoning and to society overall. There is strong and growing evidence in the scientific community that the societal benefits of preventing lead poisoning vastly exceed the costs of not addressing the problem^{27, 28, 29, 30}.

Currently, Wisconsin has approximately 540,000 children age 0-6. For these children, eliminating any exposure to lead would save Wisconsin **\$7 billion** in direct costs while experiencing an increase in productive capacity and earnings of **\$21 billion**. These figures are inferred costs for Wisconsin based on a detailed analysis conducted in New Jersey³¹ that examined direct medical costs, special education costs, crime and juvenile delinquency costs, reduced high school graduation, and the effects on lifetime earning and costs to state government.

A 2005 Wisconsin report³² examined the costs and benefits of window replacement in homes built before 1950 where children under the age of 6 reside. Windows are the locations that typically have the highest lead dust measurements of any surface in a house. Wisconsin participated in an earlier national study that concluded that window replacement is an effective lead poisoning prevention strategy. The report demonstrated that the total health benefit per child is \$45,000 if the child was never exposed to lead. The health benefits considered were increased lifetime earnings, reduced neonatal mortality, avoided direct medical costs, and reduced special education, juvenile delinquency and crime costs. These results are similar to the New Jersey estimate in factors and value. In addition to health benefits, there are energy and market benefits due to window replacement, such as reduced heating and cooling costs and increased home value. The report estimated the cost for Wisconsin in 2005 was \$3.1 billion for those known to be lead poisoned, based on a conservative estimate of I.Q. points lost, multiplied by loss of lifetime earnings. Since these costs are from a single year (2005), similar monetary losses will occur for each year the Wisconsin housing stock is not made lead-safe.

The bottom line is homes that poison children with lead cause Wisconsin to pay significant costs due to medical, educational, and criminal justice expenses. For example, Wisconsin spends \$5.3 billion per year on education, including \$375 million for special education and over \$1 billion on corrections. A portion of these costs can be attributed to lead poisoning. Other costs arising from lead poisoning are paid initially by individuals and ultimately by society as a whole as a result of increased crime, especially violent crime, and decreased productivity and earning capacity of citizens affected by lead as children. It is a serious problem that has a readily identifiable solution — remove lead paint hazards from older homes.

LEGISLATIVE REPORT REQUEST 1:

Propose ways that Wisconsin can evaluate costs borne by our educational and criminal justice systems attributable to childhood lead poisoning

Wisconsin has well documented the prevalence and severity of the lead poisoning problem in the state, notably in the award-winning report *The Legacy of Lead*³³. That knowledge coupled with extensive research and comprehensive cost analyses from other states is the basis for the IOC recommendation that attention be paid to eliminating the root cause of lead poisoning. However, ongoing collaborative data efforts are warranted to better track and evaluate the success of lead poisoning elimination efforts.

Currently there are limited resources to conduct tracking and data analyses and evaluation, and additional resources are needed for the Wisconsin Department of Health Services (DHS) and partner agencies. It will be important to evaluate short and long term outcomes produced by a revolving loan fund that is proposed in the next section. In the short term, we will need to measure the success of the revolving loan program and the educational campaign, in terms of the number of loans, the number of homes fixed, the number of children protected, the number of educational events and the number of persons educated. Over the long term, as more homes are fixed and more children are protected from lead paint hazards, we will need to measure the impact on society and benefits to Wisconsin taxpayers in terms of changes in educational outcomes, reductions in special education enrollment, and decreases in crime and delinquency. This will enable the Wisconsin Legislature to better assess the value of ongoing investments to prevent childhood lead poisoning.

Recommendation: If a revolving loan fund is established, more resources are needed to identify appropriate outcome data (see Appendix A), to allow different data systems to communicate, to analyze data and to interpret the results of statistical studies so Wisconsin can better track the impact of lead poisoning elimination efforts.

LEGISLATIVE REPORT REQUEST 2:

Propose alternative methods to prevent lead poisoning, including strategies to accelerate Wisconsin's progress at evaluating and abating lead paint hazards in housing

Earlier this paper notes the immense personal, family, and societal costs of lead poisoning in Wisconsin. Senate Joint Resolution 65 makes note that lead poisoning is preventable and requests the IOC to propose alternative methods to prevent lead poisoning, including strategies to accelerate Wisconsin's progress at evaluating and abating lead paint hazards in housing.

In October 2004, the U.S. Centers for Disease Control and Prevention (CDC) Advisory Committee on Childhood Lead Poisoning Prevention (ACCLPP) developed a multifaceted primary prevention approach that focuses on housing as the primary vector of the disease³⁴. The intent of this approach is to accelerate progress in eliminating childhood lead poisoning. In that plan, the CDC ACCLPP included the following recommendations specifically for legislators:

- Fund the development of more safe and affordable housing (e.g., develop financing and subsidy strategies at the federal, state, and local levels).
- Provide adequate resources for lead poisoning prevention efforts (e.g., develop strategies to encourage everyone, including property owners, families, and lenders to acknowledge the value of lead-safe housing and to take action to make sure children are protected).

There are more than 400,000 homes built in Wisconsin since 1950 with existing lead paint hazards. Currently Wisconsin communities use HUD lead hazard control grants and other limited federal housing funds, (e.g., CDBG and HOME), to replace windows and complete other rehab to address lead paint hazards in about 3,000 to 5,000 older homes per year. In addition, about 5,000 older homes with lead paint hazards are demolished each year. Unfortunately, federal funds have not been sufficient to address all the lead paint hazards in Wisconsin housing. At our current rate of progress of fixing lead paint hazards in Wisconsin housing, it will take many decades to fix all these homes, during which time thousands of children will be poisoned. By creating options to eliminate exposure of children to lead, Wisconsin government can substantially reduce the social and economic costs now burdening Wisconsin taxpayers. The IOC advises the Wisconsin legislature to take action to establish a sustainable funding source for lead-safe housing.

Recommendation: Create a revolving loan fund. The IOC recommends the creation of a statewide sustainable no- or low-interest revolving loan fund accessible to all income levels. The fund should be a dedicated source of funding to fix lead paint hazards and thus create lead-safe housing for children. The prevalence of childhood lead poisoning reflects the large number of houses with lead paint hazards and the limited financial resources of many homeowners to eradicate lead paint hazards in their homes. Eliminating lead poisoning requires fixing the houses with lead paint hazards — predominantly in those houses built before 1950. This approach would strategically target Wisconsin's highest risk dwellings since approximately 90 percent of Wisconsin's children who are lead poisoned reside in dwellings built before 1950. Wisconsin's experience with HUD-funded lead hazard control grant programs demonstrates that replacing old lead-painted windows combined with other targeted lead hazard reduction strategies effectively reduces lead dust exposure and blood lead levels in children¹.

A revolving loan fund to fix lead paint hazards would have two significant economic impacts in Wisconsin: 1) create expanded product demand positively affecting many Wisconsin businesses in the window, door and siding manufacturing industries, and 2) create jobs for people who are in the home remodeling trades. For example, Wisconsin already sells in excess of \$1 billion in windows annually; many more windows would be sold and installed as a result of a revolving loan fund to fix lead paint hazards, thereby stimulating economic growth. A program to replace windows and other lead-contaminated building components in older homes will create jobs, save energy, improve local property values and local tax bases, *and* protect children from lead-based paint hazards. The National Association of Home Builders has developed statistical models that project the positive impact of construction sector spending on local economies both directly and through what economists call the “ripple effects” of such investments³⁵. Investing in these projects will have a positive impact on small businesses since, in the current economy, Wisconsin contractors are in need of work. In addition to health benefits, there are energy and market benefits due to window replacement, such as reduced heating and cooling costs and increased home value. Investment in lead poisoning prevention is not only a public health imperative — one owed to Wisconsin’s children and society — it is good business sense.

An adequately funded revolving loan program would accelerate Wisconsin’s progress at abating lead paint hazards in housing by providing a resource to fix these properties. Lead hazard control activities, consisting of window replacement and full paint stabilization, are estimated by HUD at a mean cost of approximately \$10,000 per home¹, based on actual lead hazard reduction programs. Actual costs vary by dwelling. An immediate investment of approximately \$4 billion could address lead paint hazards in all of the 400,000 pre-1950 homes with lead paint hazards, thus rapidly eliminating lead poisoning. A more realistic strategic, targeted approach would make older dwellings that are currently occupied by families with young children a first priority. At any one time, about 110,000 Wisconsin homes with lead paint hazards are likely to be occupied by families with young children; these higher risk homes could be the priority focus for a revolving loan program. An annual investment of at least \$20 million a year would allow for lead paint hazards to be addressed in at least 2,000 additional homes each year.

A recent survey found that revolving loan funds work best when they have a clear mission, start with solid initial capitalization and are simple and user friendly³⁶. For a revolving loan fund to be effective, it should:

- Focus funds on dwellings built before 1950, targeting resources to high risk dwellings. (Data is available to enable initial targeting to the most high risk dwellings.)
- Keep interest rates as low as possible in order to make it attractive to and feasible for borrowers.
- Establish a mechanism to determine eligibility requirements.
- Cover administrative and operational costs in the loan.
- Make participation simple with a minimal application fee or a small percentage of the funds requested.
- Make loans available in ways that maximize access to persons of all income levels.
- Allow local communities to use the revolving loan fund to correct lead paint hazards in properties where lead-poisoned children reside when owners have not complied with work orders to promptly correct identified lead paint hazards.
- Be evaluated regularly for loan performance, fund balance and demand.

There are several state agencies that could administer these funds, including the Division of Housing and Community Development and the Wisconsin Housing and Economic Development Authority (WHEDA). These agencies could contract with banks, credit unions and non-profit housing agencies as well as local units of government to administer these loans and ensure that funds are widely available to all eligible owners.

As an added benefit, a state funded program model would enable the state to more successfully compete for the limited federal dollars available for lead hazard control. These grant funded federal programs typically require between 25 percent and 35 percent matching funds. Thus, new state funds to address lead paint hazards could multiply their impact by three to four times if the state were able to receive additional federal grant funds. This is especially important as there is clear and compelling evidence that Wisconsin gets less than its fair share of federal housing funds. A report published by the Federal Reserve Bank of Chicago found that Wisconsin received 42 federal dollars per capita compared to the national average for all states of 82 dollars per capita in federal funding for housing and community development over a 25 year period³⁷. This discrepancy puts Wisconsin at a disadvantage when it comes to protecting children from lead paint hazards. The Wisconsin legislature could urge the Wisconsin congressional delegation to correct the inequities in federal funding formulas that allows Wisconsin to receive less than its fair share of federal housing funds.

Recommendation: Launch a strategic community awareness campaign for lead-safe housing. The IOC recommends the creation of a public education *Kids UnLEADed* campaign which is critical for both informing the general public about existing lead paint hazards and motivating action to fix lead paint hazards by utilizing the low interest loan fund.

- The Wisconsin Apartment Association has been a very strong partner in educating their membership of the dangers of lead-based paint hazards by conducting seminars on preventing lead poisoning at local chapter meetings and their annual conferences. They are advocates for a loan program to eliminate lead paint hazards. They also are poised to take part in a campaign to inform people of the loan fund as property owners often are “asset-rich” but “cash poor” and would welcome an accessible resource for these urgent repairs to remove lead paint hazards.
- In 2010, the EPA published a new rule called the *Renovation, Repair and Painting* (RR&P) Rule which Wisconsin adopted and put into effect April 22, 2010. DHS is implementing this rule by working with associations throughout Wisconsin that represent building contractors, property owners, child care providers and schools.

The efforts outlined above provide a foundation for a broader public education campaign regarding the revolving loan fund through networks of certified lead-safe renovators, schools, landlords and child care providers. In addition, a voluntary income tax donation as defined in the next section is another way to raise public awareness about lead paint hazards in the home and the revolving loan fund as a resource.

LEGISLATIVE REPORT REQUEST 3:

Identify various proposed sources of funds

The IOC has identified three sources of funding that the Wisconsin State Legislature should advance to implement the previous recommendations: 1) authorize a paint surcharge; 2) establish additional bonding authority; and 3) create opportunities for voluntary contributions by taxpayers when filing Wisconsin income tax returns.

- 1) **Authorize a paint surcharge.** The IOC recommends the Wisconsin State Legislature authorize a surcharge of a minimum \$1 per gallon of paint sold in Wisconsin to be used for the revolving loan fund. Based on U.S. Census data on paint (“architectural coatings”) sales, \$1 a gallon is expected to generate approximately \$15 million dollars per year in Wisconsin³⁸. Such an approach is reasonable since paint and other coatings provide temporary short term protection from lead paint hazards. A surcharge on coatings can then be used to support more permanent solutions to the societal problem of lead on older dwellings.
- 2) **Establish bonding authority.** The IOC recommends that the Wisconsin State Legislature create additional bonding authority as a dedicated source of funding for the revolving loan fund. The legislature has already authorized WHEDA and the Department of Veterans Affairs to issue bonds for sale to investors to generate funds that would support safe and affordable housing in Wisconsin.

Investors buy bonds on the promise that they will be paid back with interest. Funds obtained from selling these bonds to investors are used to issue loans for housing (including housing purchase and housing rehabilitation loans). The interest that borrowers pay on the loans is then used to both pay back the investors who purchased the bonds and pay interest on these investments. The investors get their initial investment back plus interest; this interest is typically exempt from federal income tax.

There are two types of bonds, general obligation bonds and revenue bonds. Loans made from revenue bonds are expected to pay back the investors in full while general obligation bonds are used when the interest on loans may not be sufficient to fully pay the investors. State issued bonds guarantee that investors will be repaid on a predictable schedule.

The Legislature has provided WHEDA with bonding authority and state funds and has authorized WHEDA to guarantee loans for a variety of purposes besides housing, including small business loans, agricultural development, tourism, non-point source pollution, agricultural chemical clean up, clean air loan guarantees, stratospheric ozone protection, farm asset reinvestment, safe drinking water and recycling. Through June of 2008, WHEDA issued \$9 billion in bonds for its programs, of which \$3 billion was still outstanding. The legislature also authorized bonds for veterans housing enabling the Department of Veterans Affairs to issue \$2.6 billion in housing loans to Wisconsin veterans through 2008. Many other states also issue general obligation bonds to fund housing programs.

The IOC also recommends the Legislature seriously examine whether the general obligation bond program could provide funds to non-profit corporations, units of government, property owners and/or licensed builders in the private sector for lead hazard reduction. The Legislature would need to statutorily structure this bonding authority to ensure fiscal accountability and compatibility with the intent of the revolving loan fund to provide deferred low interest loans.

- 3) **Create a voluntary contribution on the Wisconsin income tax forms and match it with general program revenues.** The IOC recommends the Wisconsin State Legislature authorize a change to Wisconsin income tax forms to allow voluntary payments from individual taxpayers to be submitted with their Wisconsin income tax payments for the revolving loan fund to abate lead paint hazards in homes. This voluntary donation could be used to fund the *Kids UnLEADed* public education campaign.

A report on voluntary contributions via the 2007 Wisconsin income tax form indicated that total contributions collected for individual causes ranged from \$50,000 to \$400,000. The number of taxpayers that contributed per cause ranged from 6,000 to 25,000. In the case of the Endangered Species Fund, all gifts (up to a total of \$364,000) are matched dollar-for-dollar by state general purpose revenue. The Wisconsin Legislature should consider a similar matching program for the revolving loan fund contributions. While this voluntary funding mechanism is not expected to create a large volume of funds, if the legislature provided matching funds, this would serve as a model for public-private partnerships to address the problem. This voluntary contribution also would be a tool to inform the public of the existence of the revolving loan fund to make older homes lead-safe and provide a way to engage the public in solving the problem.

IN CLOSING

The legacy of lead poisoning in Wisconsin includes thousands of children who are brain damaged, increased crime rates and increased public costs in our schools, medical and criminal justice systems. In addition, billions of dollars are lost in productivity and earnings. Lead poisoning of children can end if leaders in Wisconsin decide to take collective action to accelerate progress at removing lead paint hazards in older homes.

The IOC is deeply grateful the Wisconsin Legislature, through Senate Joint Resolution 65, has decided it is time to protect Wisconsin's children, communities, and taxpayers from the devastating outcomes brought on by lead poisoning. The IOC is honored to present this report with its carefully researched and practical recommendations for Wisconsin to establish the mechanisms and resources that will lead to the removal of lead paint hazards in homes. Without a doubt, these actions will save the lives and futures of children and improve the health and productivity of Wisconsin's citizens. The IOC stands ready to work with the legislature to advance these efforts.

APPENDIX A

Thus far, state agencies have responded positively to the legislative directive (SJR65) urging state agencies to collaborate to identify and evaluate the burden imposed by lead poisoning on Wisconsin. Wisconsin agencies, by continuing to collaborate to examine the impact of childhood lead poisoning on educational and correctional outcomes, will enable DHS, the IOC and partner agencies to better track and evaluate the progress of lead poisoning elimination efforts.

DHS and the IOC are seeking to compare Wisconsin statewide blood lead data on tested children with other agency's data to statistically evaluate the impact of lead poisoning in the areas of education, juvenile delinquency and criminal justice. Inter-agency collaborative efforts are underway to share information with careful protection of the confidential nature of personal records.

The committee has been working with the following agencies to begin identifying data that will allow us to better evaluate lead costs, impact and lead poisoning elimination progress.

- Department of Public Instruction
- Department of Children and Families
- Department of Corrections Division of Juvenile Corrections
- Wisconsin Court System
- State Prosecutor's Office

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- ³⁸ The U.S. Census reports that the volume of paint and allied products used for architectural coatings and sold in the U.S. varied between 617 to 777 million gallons per year during the period from 2005 to 2009. See http://www.census.gov/manufacturing/cir/historical_data/mq325f/. Wisconsin's share of the national market for architectural coatings is 2%. This is reasonable since Wisconsin has about 2% of the nation's housing units according to the U.S. Census. Thus Wisconsin paint sales will be between 12 and 15 million gallons per year. Therefore a surcharge on paint of \$1.00 per gallon would generate from \$12 to \$15 million per year.

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